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COUNSEL FOR DEFENDANTS

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA

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NATIONAL ASSOCIATION FOR GUN RIGHTS, INC.,  v.  JONATHAN MOTL, in his official capacity as the Commissioner of Political Practices for the State of Montana, <i>et al.</i> ,  Defendants.	Case No. CV 16-00023-H-DLC  <b>BRIEF IN SUPPORT OF MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION (DOC. 3) AND TO FILE ANSWER</b>
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Defendants seek an extension of time to file their response to Plaintiffs' Motion for Preliminary Injunction (Doc. 3), and to file their Answer to Plaintiffs' Complaint (Doc. 1). Defendants request that this Court extend the filing date for both the preliminary injunction response and Answer to April 27, 2016, one week after the Answer's current due date.

These extensions are necessary because Commissioner Motl is scheduled to have knee replacement surgery on Tuesday, April 12, 2016, and will likely be out of the office recovering for a week to two weeks after surgery. *See* attached declaration. Additionally, counsel for Defendants have several conflicts over the next few weeks. Stuart Segrest has a State Bar Trustee meeting April 15, 2016, in Missoula, and a brief due in the Montana Supreme Court, in the case of *Wrzesien v. State*, No. DA 15-0554, on April 21, 2016 (on which he has already received two extensions). And Matthew Cochenour has briefs due, in *Montanans for Community Development v. Motl*, on April 8, 2016, and April 22, 2016, and in *Lair v. Motl* on April 11, 2016, with a hearing in *Lair* on April 18, 2016.

Respectfully submitted this 8th day of April, 2016.

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By: /s/ J. Stuart Segrest  
J. STUART SEGREST  
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## **CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing document with the clerk of the court for the United States District Court for the District of Montana, Helena Division, by using cm/ecf system. Participants in the case who are registered cm/ecf users will be served by the cm/ecf system.

DATED: April 8, 2016

*/s/ J. Stuart Segrest*  
J. STUART SEGREST  
Assistant Attorney General